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Ministry of the Environment

and the Protection of the Territory and the Sea

DIRECTORATE-GENERAL FOR SUSTAINABLE GROWTH AND THE QUALITY OF DEVELOPMENT

DIVISION V - ENVIRONMENTAL ASSESSMENT SYSTEMS

To the Director General of the General Management for Sustainable Growth and Quality of Development Dr. Oliviero Montanaro CRESS-UDG@minambiente.it

SUBJECT: [ID_VIP: 5631] Preliminary assessment pursuant to art. 6, paragraph 9, of Legislative Decree 152/2006 and subsequent amendments relating to the redevelopment project of the Acerra (NA) power plant.

Principal: ENGIE SERVIZI SpA
Technical note.

With application dated 22/10/2020, acquired under prot. MATTM / 87341 of 28/10/2020, the Company Engie Servizi SpA has requested the completion of a preliminary assessment, pursuant to art. 6, paragraph 9, of Legislative Decree 152/2006 and subsequent amendments, for the project referred to in the object.

Together with the request for preliminary assessment, the checklist with various attachments was sent, which is prepared in accordance with the forms published on the portal of environmental assessments and authorizations VAS-VIA-AIA (www.va.minambiente.it) and the directorial decree n. 239 of 03/08/2017 containing "Contents of the forms necessary for the purpose of submitting the checklists referred to in Article 6, paragraph 9 of Legislative Decree 3 April 2006, n. 152,
as amended by article 3 of Legislative Decree 16 June 2017, n. 104 ".

Analysis and evaluations

On the basis of the information elements provided by the proposing company as a whole, the significant elements of the project proposal are summarized below with particular regard to the environmental aspects.

It should be noted in the introduction that, as regards the authorization framework, the Company reports that the Campania Region, with Executive Decree no. 149 of 31/05/2012, issued an authorization to operate the plant. On the other hand, there are no previous Environmental Impact Assessments carried out in relation to the same energy plant.

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The project is aimed at the redevelopment of the Engie energy production site in Acerra (NA) which supplied energy to the neighboring FCA production site in Pomigliano d'Arco (NA), which is currently not operational. The initiative to modify the existing plant, through the conversion of the aforementioned site, is aimed at resuming its energy production activity with the aim of improving the existing environmental performance.

At the Acerra thermoelectric plant, which is currently not in operation, two identical turbogas plants are currently installed for a total thermal power of 206 MWfuel (intended as incoming fuel) and capable of generating electricity for a total power of 102 MWe .

Engie Servizi SpA has identified the possibility of a resumption of activity production through a redevelopment of the plants of the plant through the following interventions:

- **construction of an electricity production plant for the "Capacity Market" ("Peaker") through the dismantling of one of the two turbo groups, the modernization of the remaining turbo group by installing a new turbine with the possibility of simple cycle operation, of the same type of current turbines but of new evolution, in simple recovery with a capacity of 46.5 MWe (electrical power); construction of an electrochemical storage system, type BESS**
- **(Battery Energy Storage) and FRU (Fast Reserve Unit) on the area made available by the dismantling of one of the two turbo groups. with a total capacity of 55MWh and 50MW / 57.2MVA of deliverable electrical power, divided into two equal sections of battery storage with a capacity of 27.5MWh 25MW / 28.8MVA.**

The Company declares that the proposed design change will make it possible to supply electricity to the national grid, helping to preserve it from the fluctuation of electricity production deriving from non-programmable renewable sources. The new storage system will be connected to the internal network, from which it will be recharged, and through which it will be able to introduce energy, obtaining a regulating action on the network. The company also stresses that all the changes will fall entirely within the perimeter of the existing plant and points out, finally, that no interventions or additional works are planned outside the site to connect to the electricity grids and natural gas distribution. because they already ex

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Figure 1 Overview of the Acerra plant

In urban planning tools, the power plant is located in an area for industrial use. In particular, the current PRGC places the area of the plant in class "D - Industrial - Plan ASI", to which the class "D5_ ASI production departments (art. 35 NTA / O)" corresponds in the recently adopted PUC.

The area where the power plant is located is about 350 meters south from the edge of the town of Acerra. The area is characterized by the presence of other productive settlements, which are part of a large industrial area, to the west, on the other hand, there are rural areas mainly intended for arable land.

As far as territorial constraints are concerned, the Engie di Acerra energy production site does not fall within areas of landscape, historical, cultural or archaeological importance. The company declares that some restricted areas pursuant to art. 136 of Legislative Decree 42/2004 are about 4 km away from the intervention site and some specific architectural and archaeological assets are located at distances greater than 10 km.

According to the PUC, the NW part of the plant area falls marginally within the 150 meter buffer zone of the Regi Lagni, a constraint not indicated in the SITAP. The artifacts are, however, outside the buffer zone, as indicated in the current AIA provision.

The area is subject to hydrogeological constraints, with a “moderate” risk of floods.

As regards the presence of protected areas, pursuant to national legislation (Law 394/1991) or protected by community legislation (sites of the Natura 2000 network, directives 2009/147 / EC and 92/43 / EEC), the company declares that the site does not fall within any of them and that from the data reported on the national geoportal (www.pcn.minambiente.it) and in the PRG of the Municipality of Acerra it is clear that the area is located at about 8.8 km, in NE direction, from the Partenio Regional Park and from the Dorsali dei Monti del Partenio SAC (IT8040006); about 7.5 km, towards the SE, from the Vesuvius National Park which includes the Monte Somma SPA (IT8030021), the Vesuvius ZSC (IT8030036), Vesuvius and Monte Somma ZPS (IT8030037) and about 11.2 km, towards the SW, from the Park metropolitan of the Hills of Naples.

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With regard to the description of the possible impacts caused by the implementation of the project, the company declares that, given the nature of the planned interventions, the construction site activities will be those typical of a construction site and for this reason, noise, atmospheric emissions and vehicular traffic they will have negligible impacts on environmental components. Furthermore, the company states that no significant excavation works are planned except for the restoration of the road network and, since it assumes that the total volume of the excavations is less than 6000 m3, places the project in the case of the so-called "small construction sites"

With regard to the operating phase, the company asserts that it will not cause significant impacts, because the proposed redevelopment project aims at improving its environmental performance because the best possible techniques have been applied in order to guarantee low levels of pollutant emissions, optimization of the consumption of raw materials, products, water and energy and adequate prevention of accidents.

Conclusions

Having examined the documentation produced as a whole, the following is shown.

The Acerra thermoelectric plant was built in 1999 by the French company Suez and has no longer been operational since 2014. Today, Engie Servizi SpA, formerly Suez, proposes a resumption of the production activity of the plant, in the face of a redevelopment of the plants of the same, in order to avoid the definitive decommissioning of the site and allow, in perspective, a positive impact on the sector. local industrial. The initiative is part of a strategy pursued at national level for the conversion of existing plants to support the national electricity grid, in order to preserve it from the fluctuation of electricity production deriving from non-programmable renewable sources.

The company claims that the plant, following the proposed changes, both due to its drastic downsizing, and due to the availability of more performing technologies and the expected operating methods, will certainly have significant impacts during operation. reduced compared to the original system.

In this regard, *first of all,* **one cannot fail to observe that such a consideration is completely misleading because the comparison should not be made starting from the existing plant, as this has not been in operation for several years, but must be done by analyzing the current state of the environment. in which there is a power station. It is a stationary plant that does not produce typical impacts due to its operation. Considering, therefore, the resilience capacity of the environments, it is not possible to evaluate the project proposal as a mere modification of the existing one but it is advisable to evaluate it as a completely new work and, as such, all the possible impacts must be re-examined in a timely manner. that the power plant will determine on the biotic**

In addition to the above considerations, it must secondly be emphasized that, from the information provided by the company regarding this plant, there are no previous environmental assessments useful for estimating the compatibility of the work with the protection of the environment and the context in which it is located. . The absence of previous studies that can be taken as a reference does not allow defining the positive or negative "environmental delta" between the authorized situation and the proposed modification, and even less can overall assessments on the plant be carried out as part of the *" pre-screening ",* **pursuant to art. 6, paragraph 9, which is characterized as a quick procedure solidly anchored to the environmental assessme**

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It follows that the project proposed by Engie Servizi SpA, even net of the proposed modification, has characteristics such as to be included among the projects referred to in point 1, letter a) of Annex II-bis to Part Two of Legislative Decree 152 / 2006 and for these projects a procedure for verifying the applicability of the EIA is required, pursuant to art. 19 of the same Legislative Decree 152/2006.

With regard to the above, it is then necessary to highlight that the need to be subjected to an environmental assessment procedure of the works in question is also consistent with European guidelines and the related jurisprudence where it has ruled that the environmental impact assessment is also necessary for the works carried out before the entry into force of the regulations on the subject, when these works require new authorizations for their functioning *(see* **judgments of the Court of Justice of the European Union C-201/02, C-81/96 , C 287/98, C-431/92).**

The
Executive Dr. Giacomo Meschini

(IT document digitally signed pursuant to Article 24
of Legislative Decree 82/2005 and subsequent amendments)